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11 Attorneys for Defendants  
ST. HELENA HOSPITAL and  
12 ADVENTIST HEALTHCARE/WEST

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14 UNITED STATES DISTRICT COURT  
15 FOR THE NORTHERN DISTRICT OF CALIFORNIA

16 TRACY ROUSSEAU and STAN  
17 ROUSSEAU

18 Plaintiffs,

19 v.

20 ST. HELENA HOSPITAL; AND  
21 ADVENTIST HEALTHCARE/WEST,

22 Defendants.

Case No. 4:17-cv-02985 HSG

Civil Rights

**STIPULATION AND ORDER TO BE  
REFERRED TO MEDIATION UNDER  
GENERAL ORDER 56**

Action Filed: May 24, 2017

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24 **STIPULATION**

25 By and through their attorneys of record, Plaintiffs TRACY ROUSSEAU and STAN  
26 ROUSSEAU ("Plaintiffs") and Defendants ST. HELENA HOSPITAL and ADVENTIST  
27 HEALTHCARE/WEST ("Defendants") hereby stipulate and agree as follows:

28 WHEREAS, this case has been assigned for early disclosures and mediation under General

1 Order 56;

2 WHEREAS, pursuant to General Order 56, the Parties must complete a site inspection and  
3 then wait 42 days before filing a Notice of Need for Mediation;

4 WHEREAS, the alleged barrier to access under the Americans with Disability Act (ADA)  
5 in this case arises from policies, not architectural barriers;

6 WHEREAS, the parties agree that a site inspection is not necessary in order to prepare  
7 them for mediation;

8 WHEREAS, the Parties wish to resolve this matter as expeditiously as possible;

9 IT IS HEREBY STIPULATED AND AGREED by and between the Parties that this case  
10 should be referred to mediation under General Order 56 immediately.

11 **IT IS SO STIPULATED.**

12  
13 Dated: July 12, 2017

DERBY, McGUINNESS & GOLDSMITH, LLP

14  
15 /s/ Celia McGuinness  
16 By: CELIA McGUINNESS, ESQ.  
17 Attorneys for Plaintiffs  
TRACY ROUSSEAU and STAN ROUSSEAU

18 Dated: July 12, 2017

POLLARA LAW GROUP

19  
20 /s/ Dominique A. Pollara  
21 By: DOMINIQUE A. POLLARA, ESQ.  
22 Attorneys for Defendants  
ST. HELENA HOSPITAL and  
23 ADVENTIST HEALTHCARE/WEST  
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**ORDER**

Pursuant to the stipulation of the parties, and for good cause shown, it is hereby  
ORDERED that this case shall be referred to mediation immediately.

**IT IS SO ORDERED.**

Dated: July 13, 2017

  
Honorable Haywood S. Gilliam, Jr.  
United States District Court Judge

1 **FILER'S ATTESTATION**

2 Pursuant to Civil Local Rule 5-1, I hereby attest that on July 11, 2017, I, Celia  
3 McGuinness, attorney with Derby, McGuinness & Goldsmith, LLP, received the concurrence of  
4 Dominique Pollara in the filing of this document.

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6 /s/ Celia McGuinness  
Celia McGuinness  
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